

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALLAN CHIOCCA,
Plaintiff,

VS.

TOWN OF ROCKLAND, DEIRDRE
HALL, EDWARD KIMBALL, LARRY
RYAN, MICHAEL MULLEN, JR.,
MICHAEL O'LOUGHLIN, RICHARD
PENNY and KARA NYMAN,
Defendants

C.A. NO. 1:19-cv-10482-WGY

**AFFIDAVIT OF NEERJA SHARMA FOR THE REPLY BRIEF IN SUPPORT OF
DEFENDANTS/COUNTERCLAIM PLAINTIFFS DEIDRE HALL AND EDWARD
KIMBALL'S MOTION FOR PARTIAL SUMMARY AGAINST
PLAINTIFF/COUNTERCLAIM DEFENDANT ALLAN CHIOCCA**

I, Neerja Sharma, under oath, do hereby depose and state as follows:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts and am counsel to Defendant and Counterclaim Plaintiff Deirdre Hall in the above-captioned matter. I make this Affidavit on my own personal knowledge.
2. Attached hereto as **Exhibit A** is a true and accurate copy of excerpts from Volume I of the deposition transcript of Edward Kimball.
3. Attached hereto as **Exhibit B** is a true and accurate copy of excerpts from the deposition transcript of John Clifford.
4. Attached hereto as **Exhibit C** is a true and accurate copy of the excerpts from the deposition transcript of Larry Ryan.
5. Attached hereto as **Exhibit D** is a true and accurate copy of the Affidavit of Edward Kimball.
6. Attached hereto as **Exhibit E** is a true and accurate copy of the excerpts from the deposition transcript of Michael Mullen.
7. Attached hereto as **Exhibit F** is a true and accurate copy of excerpts from the deposition of Michael O'Loughlin.
8. Attached hereto as **Exhibit G** is a true and accurate copy of excerpts from the deposition transcript of Richard Penney.

9. Attached hereto as **Exhibit H** is a true and accurate copy of an email from Attorney Shafran to Boston 25 Fox News dated July 6, 2018.

Signed this 4th day of February, 2022 under the pains and penalties of perjury.

/s/ Neerja Sharma

Neerja Sharma, Esq.

CERTIFICATE OF SERVICE

I, Neerja Sharma, do hereby certify that this document filed through the ECF system shall be sent electronically to the registered participants as identified on the Notice of Electronic Filing on February 4, 2022.

/s/ Neerja Sharma

Neerja Sharma